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Alternative Radiological Source Terms for Evaluating Design Basis Accidents at Nuclear Power Plants

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Alternative Radiological Source Terms for Evaluating Design Basis Accidents at Nuclear Power Reactors

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General Comment

Reference A-14 concludes that there is high confidence that the main steam lines and structures, systems and components in the alternative pathway will be available for fission product dilution, hold-up, and retention. We disagree with this conclusion, that is based almost entirely on the inherent seismic robustness of the condenser and its associated piping and does not address the functionality of the components. While Regulatory Position A-5.4 touches on these issues it is incomplete. The reliance for credit for the accident analysis needs to be supported by past alternative source term application seismic walkdowns. These walkdowns identified the need for plant modifications to address a variety of seismic-related issues, such as block wall impacts on instrument lines that could cause a divergent release path away from the condenser, as well as other types of interactions and anchorage issues. It should address what actions need to be taken to make the condenser available including the need to isolate potentially divergent paths, and what program, procedures, and plant modifications (such as establishing emergency power to the pathway valves and boundary valves that must isolate) must be established to ensure this pathway will be maintained as highly reliable mitigation. Only after these actions are addressed and taken by the licensee should the staff conclude there is high confidence that the pathway to the condenser to warrant credit in the accident analysis.

Do you have any idea how much changing all the documents from Loss of coolant accident to MH-LOCA costs a licensee in time, just for the sake of changing back to a term that was removed over 20 years ago? When this terminology is used the source term should not be used incorrectly. It should represent the maximum hypothetical value, not a 50th percentile value for the release fractions and duration.